

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CASE NO. 5:14-cr-00926

**VASCULAR SOLUTIONS, INC., and
HOWARD C. ROOT,**

Defendants.

DEFENDANTS' JOINT MOTION TO TRANSFER VENUE

Defendants Vascular Solutions, Inc., and Howard C. Root, through their undersigned counsel, respectfully move this Court for an Order transferring venue in this matter from the Western District of Texas to the District of Minnesota pursuant to Fed. R. Crim. P. 21(b). This Motion is based upon the accompanying Memorandum of Law and supporting affidavits, the arguments of counsel, and all files, records and proceedings herein.

Dated: December 9, 2014.

By: s/ John C. Richter
John C. Richter
Michael R. Pauzé
King & Spalding LLP
1700 Pennsylvania Avenue NW
Suite 200
Washington, DC 20006
(202) 737-0500

s/ Johnny Sutton
Johnny Sutton
Ashcroft Sutton Ratcliffe
919 Congress Avenue, Suite 1500
Austin, TX 78701
(512) 370-1800
*Attorneys for Defendant Vascular
Solutions, Inc.*

By: s/ John W. Lundquist
John W. Lundquist (MN #65286)
Dulce J. Foster (MN#285419)
Kevin C. Riach (MN #389277)
Fredrikson & Byron, P.A.
200 South Sixth Street
Suite 4000
Minneapolis, MN 55402
(612) 492-7000
*Attorneys for Defendant Howard
Root*

I hereby certify that on December 9, 2014, I electronically filed the foregoing document via the CM/ECF system, which will effectuate service on all counsel of record who are properly registered for CM/ECF service.

I further certify that I caused a copy of the foregoing document and the notice of electronic filing to be mailed by first class mail, postage paid, to the following non-ECF participant:

John C. Richter, Esq.
King & Spalding LLP
1700 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006-4707
ATTORNEY FOR VASCULAR SOLUTIONS

Johnny Sutton
Ashcroft Sutton Ratcliffe
919 Congress Avenue
Suite 1500
Austin, TX 78701
ATTORNEY FOR VASCULAR SOLUTIONS

s/ John W. Lundquist